



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

JON S. CORZINE
Governor

LISA P. JACKSON
Acting Commissioner

Christopher Anderson
Director Environmental Affairs
L.E. Carpenter and Company
33587 Walker Road
Avon Lake, OH 44012

FEB 22 2006

Re: L.E. Carpenter Superfund Site
Wharton Borough, Morris County, New Jersey

Dear Mr. Anderson:

The New Jersey Department of Environmental Protection (NJDEP or Department) as well as the United States Environmental Protection Agency (USEPA) have completed a review of the Post Remedial Monitoring Plan dated October 14, 2005. This document was prepared by RMT, Inc. on behalf of L.E. Carpenter and Company (LE). The NJDEP and USEPA have the following comments which must be addressed.

General Comments (NJDEP and USEPA)

Please be advised that the NJDEP and USEPA are in receipt of the Quarterly Monitoring Report -- 4th Quarter 2005 dated February 8, 2006, which includes an approach to sampling soil gas in the MW-19 area. This report is currently being reviewed by the NJDEP and USEPA and any comments will be forthcoming shortly.

As specified in the NJDEP's letter dated December 22, 2005 (see attached), the NJDEP and USEPA remain concerned regarding the MW-19 area, which includes the possibility for vapor intrusion across Ross Street, as well as the observed significant increase in monitored concentrations reported during 2005. This above referenced report includes sections regarding both the vapor intrusion and MW-19 area.

The USEPA has conducted a preliminary review and based on the information provided in the newly received February 8, 2006 report, the USEPA concurs with additional installation of MW-19-12 at the revised location.

It must also be noted that not all of the USEPA's concerns have been addressed in the MW-19 area. It would seem to be more efficient and cost effective to actively remediate the MW-19 area now, and thus mitigate any potential vapor intrusion concerns as well as the further spreading of contaminants. There is considerable delay involved with continuing to sample and install new monitoring points and wells, and wait for the results. The USEPA continues to strongly believe that the utilization of a relatively simple technology such as dual phase extraction (DPE), or other technology which could be quickly evaluated by LE and presented in a new proposal, would save considerable time and effort, be overall more efficient, and address possible concerns for human health and the environment that may otherwise arise in the future. It should be noted that the USTs in the MW-19 area were removed 15 years ago, yet significant impacts to groundwater are ongoing.

It should also be considered that with the completion of the 2005 source reduction remediation, there could be changes in shallow groundwater flow, which could affect the MW-19 area. The potential effect downgradient of the cement-bentonite slurry monolith was discussed in the October 2005 Post Remedial Monitoring Report, however, the overall effects are not presently known with respect to surface recharge and groundwater flow, and it may be some time before a new groundwater flow pattern stabilizes.

At this time, the USEPA recommends approval of the Post Remedial Monitoring Plan, with the incorporation of the enhanced monitoring proposal as outlined in the February 2006 Quarterly Monitoring Report. However, the USEPA additionally requests that a revised submittal be presented as a final document which incorporates the updated new

information from the February 2006 Quarterly Monitoring Report. Moreover, the USEPA strongly recommends that serious consideration for the active remediation of the MW-19 area not be put off much longer.

As referenced above, the NJDEP as well as the USEPA are currently conducting a detailed review of the February 8, 2006 report and any comments will be forthcoming shortly.

Specific Comments (NJDEP):

Section 2.3.2 Surface Water Monitoring Point Location and Design, page 2-3: The plan proposes the collection of water samples at four Rockaway River sample points. Since two of the original river sample locations (SW-R-3 and SW-R-4, Figure 2) were eliminated, it is unclear whether the proposed locations include the recently observed discharge points (sheen) along the Rockaway River. Surface water sampling at the discharge points shall be added to the post remedial quarterly monitoring and sampled quarterly thereafter.

Monitoring Well Installation: LE proposes to install 13 new monitoring wells to replace the wells which were sealed and abandoned during the excavation activities. The NJDEP concurs with this proposal but requires that LE first install three wells to determine representative ground water flow direction in the formerly contaminated and free product areas of the site. This will ensure that the new wells are installed in the proper locations to monitor these areas. Approximately 10 wells were left in-place but are installed in a line along the river or on the western portion of the site. Ground water flow direction in the areas of interest cannot be determined using just these wells.

Once the three wells are installed and ground water flow direction is determined, LE shall submit a map with the proposed locations of the remaining wells for the NJDEP's review. Any proposal must monitor the former source area(s) and downgradient areas.

Natural Ground Water Remediation Proposal: The report appears to be proposing natural ground water remediation for the site. Accordingly, LE must submit a proposal for this remedy which complies with N.J.A.C. 7:26E-6.3(d)(e) and 7:26E-6.4(c). This does not include Area 19 as that area may require additional delineation and/or remediation.

Sampling Methods: LE is proposing low-flow sampling for the monitoring wells. This is conditionally acceptable, as LE must profile sample each well to identify the most contaminated or contributing zone. Subsequent sampling will target this zone.

Field Sampling Filtration Methods, page 3-13: LE is proposing to filter ground water samples for metal analysis. The NJDEP cannot concur with this proposal, as no ground water sample shall be field filtered during collection, per the NJDEP Field Sampling Procedures Manual – August 2005, section 6.9.10.

Should you have any questions please contact me at (609) 633-1416.

Sincerely,



Anthony Cinque, Case Manager
Bureau of Case Management

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